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Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

N11 Code / National Suicide Hotline Improvement Act of 2018
WC Docket No. 18-336; CC Docket No. 92-105

Re: DRAFT Report and Recommendations on the Feasibility of Establishing a 3-Digit Dialing Code for the National Suicide Prevention and Mental Health Crisis Hotline System.

Note: I am submitting these comments as a concerned citizen, an Air Force Viet Nam Era Veteran and someone with a strong background working with the North American Numbering Plan (NANP). While I am a VA Employee, these comments have not been vetted by the VA, they are my professional opinions based on work experience. I have represented a previous employer at the Alliance for Telecommunications Industry Solutions (ATIS) on the Industry Numbering Committee (INC) and representing ATIS/INC at the North American Numbering Council (NANC) after co-chairing a committee to research another Congressionally mandated report for Numbering for Relay Services for the Deaf and Hearing Impaired. I have worked at industry level on several Area Code Splits and Overlays.

Call Volume Studies: The industry is working to analyze Utilization/Call Volume for existing N11s. I would like to point out that 611 as currently used, has many calls that are out of scope for its intended purpose. Originally intended for Telecom Service, it is now typical for service calls to end with a sales pitch from the SP offering upgrades. Also, Telcom Carriers now include Cable TV, Internet and even Company Branded Credit Cards. As a result, 611 is no longer exclusive to Telecom, it has been expanded into other industries. It is now a 3-digit phone number for companies offering more than just Telecom and thus 611 becomes a competitive advantage over Cable TV providers not offering Telecom and now a Telecom SP advantage within the Credit Card industry.

Therefore, a call volume analysis should exclude or at least break out sales activity as well as non-Telecom transactions. Call volumes should also be per transaction (it's not uncommon to need to take a step then need to call back, often several times before resolving an issue). SPs should also provide data comparing 611 calls to calls via their 800#, as well as internet chat (automated and live) and other real-time communications avenues to get the full picture.

That said: Is utilization / volume comparing Public Service N11s against a Customer facing N11 used for Service, Sales, and even Credit Card updates... relevant? All of the other N11s have held to their original roles, defined when they were placed in operation, each a Public Service role. As the Telecom Industry evolved, 611 has become obsolete from its original "Service" role

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and added (possibly without consulting the FCC) new roles. If there were to be a Public Service Announcement for 611, it would need to include:

- 611 only connects to the Telecom Company providing service for your phone.
- 611 is not offered by all Service Providers.
- If your phone isn't working, find your Service Provider's 800# and call from another phone.
- If you need help with your phone, find your Service Provider's 800# and call from another phone.
- To switch service to another Service Provider, find your new Service Provider's 800# (you call from your current phone).
- If you are in an Enterprise phone system (at work), 611 may be blocked, call your company's Telecom Department or IT Help Desk.
- If you are on an employer provided cell phone, 611 may be blocked (see above).

For that reason, Public Service Messaging for 611 became too complex years ago and there haven't been PSA's for 611 for decades.

Costs: While repurposing any of the Public Service N11s (other than 611) would be difficult and take significant planning to ensure a difficult to identify target audience is informed that the N11 is no longer being used for that Public Service function, 611 is only advertised through direct marketing. Carrier billing or mailing inserts (as was used with Area Code Splits), and other messaging direct from the SP to their customers will provide Customer Education for the already existing and functional 800# access to Sales and Service. Minimal Public Service Announcement will reinforce the message as a secondary effort. Once 611 is out of service, an intercept message, also similar to NPA Splits, will be able to include the SP specific Sales and Service 800# (this would continue through the aging period). Since the industry was notified in FCC [04-111](#) (III, A, 1,8 - May 14, 2004) that use of 611 could be "discontinued on short notice". Given the out of scope current usage, I believe the cost (minimal with inclusion in other direct communications) to discontinue usage should be on the individual SPs.

Public Education (repurposing 611): The draft report gives the impression that public education for the N11 for Suicide Prevention would be part and parcel of the disconnect from its current usage. While with permissive dialing for NPA Splits that made sense (a company could start advertising its new number during "Permissive Dialing"), it does not make sense with discontinue and repurpose as with Suicide Prevention. We should look to the Mental Health professionals to determine timing for 611 for Suicide Prevention PSAs, I feel very likely it should not be at the disconnect or start of aging, but after 611 has been tested as operational to the existing Suicide Prevention 800-273-TALK.

For Consideration by the FCC: I would like to suggest that given the evolution of 611 from service when the Telecom Industry was just one company or "Ma Bell", to a function that can no longer be driven by Public Service Announcements and has an unintended expanded use for Sales as well as crossing to other industries creating a Competitive Advantage which was never envisioned for N11s. I suggest that under Docket 92-104 (and or [04-111](#)) that an order is placed to discontinue use of 611, separately from, but potentially contributing to WC 18-336. This could be underway ahead of the report to Congress as a stand-alone action to resolve the Competitive Advantage conflict. While I feel the Education and Aging period doesn't need an extended time frame, I know the industry has suggested 5 years. If something approaching 5

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years is the determination of the FCC for aging, this recommendation would allow for aging of 611 (such as it may be defined) as it transitions to Suicide Prevention, to start much sooner. Given the potential lifesaving impact as described in the SAMHSA report, and with the fact that there are nearly 45,000 Suicides every year, over 180,000 since I first proposed 611 as a 3-digit solution to improve access for Suicide Prevention. In the words of a former employer... "Hurry Every Time You Get a Chance."

Thank you for your time and consideration for this effort. We are all going to be able to say that we had a part in a significant social impact to save lives.

A final (off topic) comment: Part of the task/assignment was to look at all of the N11s. Although 411 in its basic form is clearly obsolete and Service Providers are often allowed to recover the cost of calls from those using the service as a convenience (as much as \$5 for a 15 second call), 411 still could and should be a public service vehicle. People living in poverty often do not have access to internet to be able to Google or ask Siri for a phone number. HHS and the FCC should work together for a mechanism to validate when a person qualifies for free access to 411. Qualifying individuals should be able to ask their carrier for exempt status from 411 charges, possibly funded by those who still choose to use 411 as a convenience. Make 411 a public service device again.

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